Fraser Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Chilliwack Forest District
9880 South McGrath Road
Rosedale, BC
V0X 1X0

November 18, 1998

This is a summary of the public input that has been received on the Timber Supply Review in the Fraser Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01741/

Fraser Timber Supply Area

Background

As part of the review of timber supply in the Fraser Timber Supply Area, two opportunities were provided for public input. The first followed release of the Fraser Timber Supply Area *Data Package* and *Information Report* in May 1997. The information report was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Fraser Timber Supply Area. A 30-day review period, ending June 30, 1997, was provided for the public to comment on these documents.

On June 18, 1998, the British Columbia Forest Service released the *Fraser Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during a 60-day review period that ended August 18, 1998.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Fraser Timber Supply Area. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Chilliwack Forest District office.

Public Review Process and Response

Chilliwack District staff actively solicited public input on the Timber Supply Review in the Fraser Timber Supply Area through the following actions:

- direct mail-out of the *Information Report* and *Public Discussion Paper* to 200 organizations and businesses active within the Fraser Timber Supply Area or adjacent timber supply areas. Both documents included a response form which readers were encouraged to complete and return to the district office.
- the *Data Package* and *Analysis Report* were available at the district office and were mailed on request.
- two information sessions on the *Timber Supply Analysis Report* were held with representatives from the forest industry, First Nations and other interest groups (see Table 1).
- two open houses were held (see Table 1).
- radio interviews were provided.
- newspaper articles were encouraged.

As Table 1 shows, over 60 individuals attended the information sessions and the open houses. The Chilliwack Forest District also received six written submissions on the *Data Package* and 13 submissions on the *Analysis Report* (see Appendix 1).

Activity (No. of participants)	**Date**
Information sessions	
Holiday Inn, Chilliwack (15)	June 18/98
Stolō First Nation (12)	June 25/98
Open Houses	
Holiday Inn, Chilliwack (15)	June 5/97
Best Western Country Inn, Chilliwack (22)	June 24/98

Table 1: Participation in public information activities

Fraser Timber Supply Area

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Fraser Timber Supply Area is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Analysis Report (and Public Discussion Paper)
- Other Comments

Data Package

Land Base Factors

The Ministry of Environment submission questions why the *Data Package* proposes only a 4.8 per cent reduction in the land base to account for riparian reserves, when five per cent was used in the Sunshine Coast Timber Supply Area. Their submission also expresses a preference to have the new protected areas excluded from the land base, even if the government has not completed formal legislative protection.

The Katzie First Nation expresses concern that the number of environmentally sensitive areas and the allowance for loss of productive land due to road networks are both insufficient.

Forest Inventory Factors

The Katzie First Nation submission questions the 23 per cent overestimation identified by the inventory audit as being perhaps too coincidental to be accurate. This submission also suggests that harvesting as soon as a minimum volume per hectare is reached takes jobs away because volumes increase dramatically and would create more work if the trees were left to grow. In addition, they question the practice of basing volume estimates on industry's utilization requirements, as this allows the removal of trees not yet ready for harvesting.

Interfor maintains adjustments are needed to the results of the inventory audit. They believe a seven to nine per cent volume increase would be achieved by removing borderline and mistyped plot locations and by including dead standing trees (inventory classes 3 and 5). Interfor also questions whether the interim old growth site index adjustments will be included in the analysis; if not, they ask for clarification and a sensitivity analysis on how site index for old growth stands is determined.

Forest Cover Requirements

Interfor's submission says the forest cover data base is detailed enough and contains sufficient netdowns to achieve forest cover requirements, and that a four-pass harvesting system is not needed. However, if a 25 per cent maximum disturbance is maintained Interfor says it should be applied at a landscape unit level and not at the management zone level. Overall, Interfor expresses concern about overlapping constraints on harvesting and requests a detailed explanation of how these will be modelled to avoid double-counting.

Interfor's submission also proposes revised forest cover requirements that incorporate the strategies approved by the provincial government in 1996 when new parks in the Fraser Timber Supply Area were announced.

Visually Sensitive Areas

The submission from the Katzie First Nation maintains that managing for visual aesthetics needs to extend beyond roadsides and waterways. Interfor suggests subdividing visually sensitive zones on the basis of slope and applying lower green-up height requirements on gentler slopes. This would make these sites more available for intensive management which would enhance timber availability. Interfor acknowledges a taller green-up height would be needed on the steeper slopes.

Biodiversity

The Ministry of Environment submission questions whether it's reasonable to assume that 75 per cent of wildlife tree patch requirements can be met in constrained (riparian) areas when most harvesting occurs well away from fish streams, in areas where retention requirements are much less.

Interfor maintains that since twice the area needed for wildlife tree patches has already been removed from the operable land base for other values, and since these areas are well-distributed on the landscape, no further reduction of timber supply is needed to meet wildlife tree patch requirements. Interfor's opinion is that not all elements of biodiversity can be, need to be, or will be maintained on every hectare of the timber harvesting land base.

The Katzie First Nation's submission expresses the opinion that biodiversity is present throughout the landscape and it is not sufficient to leave small patches of forest standing. This does not allow for the living interactions of all species. Their submission also suggests that allowing the re-establishment of ecologically accepted species in even-aged stands only allows forest companies to alter forest stands to meet their needs.

The Ministry of Environment submission requests clarification on how the figure of 13 per cent was determined as the minimum area that will be occupied by trees older than 240 years. Should this figure be adjusted later, the ministry assumes that will occur only in landscape units classified with a low emphasis on biodiversity. As well, the ministry assumes 50 per cent of the older forests required to be retained will come out of operable landbase, in accordance with the *Biodiversity Guidebook*.

Deer Winter Range

The Ministry of Environment submission says it is their understanding the timber supply analysis will proceed using 18,000 hectares for deer winter range, even though only 15,000 hectares have been identified to date. The ministry is concerned about the possibility of further loss of suitable deer winter range and points out that the deer habitat management plan, when completed, will address outstanding concerns on this issue.

Interfor says deer winter range should be managed as outlined in *Deer and Elk Habitats in Coastal Forests of BC*. This includes designating areas within the 15,000 hectares as retention or rotational winter range, and establishing various forest cover requirements to manage for snow interception and spring forage.

Socio-Economic Concerns and First Nations Impacts

The Katzie First Nation submission says the models being used to identify areas of concern to First Nations are insufficient and fail to identify many areas. They express concern that by the time these models are adjusted, valuable history and artifacts will be destroyed. The Katzie also express concern about the dominance of the forest industry as an economic force, pointing out the negative impacts that are starting to be identified (e.g. declining fish stocks, water pollution). In their opinion, the forest sector must start to put more back into the forest resource, thus mitigating job losses.

The District of Kent asks that the economic and social impacts of the Timber Supply Review be minimized in the district. An individual submission suggests more tenure must go to well-informed, environmentally sensitive small operators to protect the forest resource and create more jobs.

In their submission, the Squamish First Nation serve notice that all grants of land and resource tenures may interfere with their aboriginal rights, and should not be made without the express consent of the Squamish Nation.

Timber Supply Analysis Report

Size of the Timber Harvesting Land Base
J.S. Jones Holdings says technology and risk management can be used to allow harvesting on a limited basis in inoperable and environmentally sensitive areas. Their submission also proposes that salvage logging be permitted in parks, and that areas considered non-commercial be assessed to identify sites that could be used for forest production, given the proper resources and strategies.

The Western Canada Wilderness Committee questions the addition of 5,000 hectares of marginal timber stands to the timber harvesting land base. Since the *Analysis Report* does not specify where these lands are, the committee is concerned the result will be an increased harvest rate now, and a lack of good quality timber in the future.

The West Coast Environmental Law Association also expresses concern about the inclusion of these marginal timber stands. They assume these stands are at high elevation and say their inclusion is ecologically dubious. The association says licensees are not operating now in these areas and likely will not in the next five years. If the marginal stands are added, they should be partitioned, but the association's stated preference is to take these stands out of the operable land base.

The West Coast Environmental Law Association notes no mention is made of mountain hemlock management issues, despite the addition of marginal stands which will include mountain hemlock stands.

J.S. Jones Holdings notes other tenures were not included in the timber harvesting land base and suggests the elimination of restrictions on harvesting on these tenures so they can be brought back into production. They also say a long-term strategy and policy changes are needed to maximize the utilization of unsalvaged losses from fire, wind and insects.

The BC Tap Water Alliance says given population expansion and growing demands on surface water supplies, the timber harvesting land base should be reduced to allow for reserves for community watersheds.

Deciduous Forest Types
Three forest industry submissions recommend that strategies and incentives are needed to encourage utilization of deciduous stands and their conversion to coniferous stands. Two environmental organizations say the inclusion of 10,000 hectares of deciduous forest, without being partitioned, will result in even faster liquidation of remaining good quality forest stands. They maintain the inclusion of the deciduous types has not been justified by the analysis report which in fact indicates these stands will likely not be logged due to poor quality, location and other constraints (notably riparian reserves).

The Ministry of Environment's submission questions the assumption that 75 per cent of the deciduous stands can be converted to coniferous and says their estimate of stands available for conversion is only 1000 hectares. They say the ability to perform in deciduous stands is unproven and many stands are comprised of deformed stems in riparian areas. The ministry states its unwillingness to compromise riparian habitat values to allow for conversion, and notes that even if converted some stands would not be available for harvest due to their location in riparian reserves. The ministry recommends the base case forecast should exclude deciduous stands from consideration.

Expected Rate of Growth and Volume Estimates
Cattermole Timber notes the need to improve accuracy of volume estimates for existing unmanaged stands and for managed stands that will be established following harvesting. They say priority must be given to assessing how fast unmanaged stands are growing. Interfor and the

Coast Forest and Lumber Association say the analysis used very conservative growth rates for both existing and future second growth stands. They ask that the old growth site index results be incorporated for all age classes.

The Ministry of Environment submission notes that the forecasted 15 per cent higher productivity in managed stands assumes funding for management will continue and the productivity of the land will be maintained.

Interfor and the Coast Forest and Lumber Association express concern about the accuracy of the inventory audit, particularly regarding the contributions of borderline and mistyped plots. In addition, they would like to see veteran tree volumes included (inventory classes 3 and 5). These proposed changes would increase volumes by seven to nine per cent, according to these submissions.

Minimum Harvestable Age

J.S. Jones Holdings says second-growth Douglas-fir on Vancouver Island's most productive sites has been harvested at 30 to 50 years of age. They suggest assumptions about economic rotation ages need to be reviewed and options such as fertilization considered.

The Western Canada Wilderness Committee says it is wishful thinking to reduce rotation ages to allow for a higher rate of harvest now in hopes that future trees can be harvested at a younger age. They say the analysis includes Douglas-fir with 50-year rotations even though no fir is currently being commercially harvested at that age.

The West Coast Environmental Law Association says the assumption that the rotation age can be reduced does not reflect current reality and points out the principle that timber supply reviews are to be based on present reality not future possibilities.

Forest Cover Requirements

Interfor and the Coast Forest and Lumber Association say the analysis does not incorporate recent changes to the Forest Practices Code, which allow the district manager to approve green-up heights of less than three metres and to rule that green-up is achieved when 75 per cent of a block meets the prescribed height. The association says these changes should reduce the time to achieve green-up by three to five years. As well, the two submissions say the contribution of second growth stands to meeting green-up requirements has not been adequately accounted for, and the application of adjacency requirements at a finer geographic scale is not warranted.

The Burke Mountain Naturalists state their objection to adjacency requirements being applied at a finer geographic scale to allow higher levels of harvesting. J.S. Jones Holdings is of the opinion that adjacency requirements should be eliminated. They say it is a false assumption that concentrated harvesting is bad, noting that nature does not create a checkerboard of disturbance. Jones also notes that requirements could be much more relaxed if landscape unit planning was initiated.

The Ministry of Environment submission notes the analysis report says at least 70 per cent of areas in the integrated management zone must be in a greened-up state. The ministry asks for clarification of the origin of this limit. The ministry also notes that, in the analysis, varying the green-up height between two and 4.5 metres had no effect on the harvest forecast. They comment that this seems to reduce the positive effect anticipated from streamlining the Forest Practices Code.

Biodiversity

According to the Burke Mountain Naturalists, the impacts of the Identified Wildlife Management Strategy were not considered in the timber supply analysis and overall only lip service was paid to protection of biodiversity values. For example, they point out that Forest

Practices Code guidelines on seral stage distribution were not adhered to because of the impact on timber supply. The Western Canada Wilderness Committee also believes the *Biodiversity Guidebook* was ignored, putting many species of fish and wildlife at risk due to habitat destruction.

The West Coast Environmental Law Association says Figure 27 of the *Timber Supply Analysis Report* clearly shows the short-term harvest level must be cut in half to meet biodiversity standards. In their view, ignoring the *Biodiversity Guidebook* indicates a disregard for public values, no commitment to Code guidebooks, and a magnification of the age class imbalance in managed forests. The association also expresses concern that the addition of marginal lands to the timber harvesting land base may mean only the very poorest stands will be available to meet old growth targets. In their opinion, further assessment of biodiversity impacts is needed.

The Ministry of Environment's submission expresses concern about the availability of inoperable forests to meet biodiversity requirements. The ministry says since Section 4.4 of the *Analysis Report* indicates an abundance of older forests outside the timber harvesting land base, achieving biodiversity objectives should have no impact on timber supply.

Wildlife Tree Patches

Three forest industry submissions maintain that the three per cent netdown in volume to allow for wildlife tree patches is unnecessary, as adjacent constrained areas can meet the requirements.

Endangered Species

J.S. Jones Holdings says more research and a tracking system are needed for endangered species, rather than assumptions that err on the side of caution. They don't believe this approach is acceptable when so many jobs are at stake.

According to the Burke Mountain Naturalists, protection for spotted owls is insufficient. They say owls will not benefit from having only 67 per cent of their identified habitat covered by trees only 100 years or older. The West Coast Environmental Law Association agrees, citing new research that owls require 80 per cent of their home range to be suitable habitat. The association also says the assumption that stands 100 years old are suitable habitat is unscientific and unproven. Both groups note that owls found after 1995 receive no habitat protection at all. The association recommends revisiting assumptions to bring them into accord with owl requirements rather than to achieve a predetermined timber target.

The Coast Forest and Lumber Association says commitments were previously made that timber supply would not be reduced by more than 10 per cent in management zones designated for owl protection.

Deer Winter Range

J.S. Jones Holdings express the opinion that deer winter range should not be set aside, but should be managed with small clearcuts. They say studies show that once second growth forests take on old growth characteristics, deer can winter successfully. Interfor notes that impacts as modelled in the timber supply analysis appear to be insignificant, but problems and conflicts arise at the operational stage.

The West Coast Environmental Law Association's submission questions why deer winter range was reduced from 18,000 hectares to 13,000 hectares. The Ministry of Environment express their opposition to this reduction, saying it conflicts with existing draft inventory maps. The ministry says the 18,000 hectare figure was agreed to in the previous Timber Supply Review as part of a compromise to change from netdown to forest cover constraints. They say it's premature to change this until the deer winter range management plan is completed over the new few years. The

ministry also notes that conflicts occur around whether identified winter range should be deferred or made available for harvest. In their opinion, deer winter range, when identified by environment ministry staff, should be deferred.

Other Wildlife and Recreation Values

The West Coast Environmental Law Association and the Ministry of Environment note that goat winter range is not considered in the timber supply analysis. In the past, goat range may have been provided by inoperable areas, but with the addition of previously inoperable lands to the timber harvesting land base, they say the goat issue must now be addressed. The ministry's opinion is that maintaining deer winter range at 18,000 hectares may help or a removal of 1500 hectares of poor site areas would be required. At the least, the ministry says a process to protect goat winter range is needed to prevent operational conflicts.

The West Coast Environmental Law Association's submission points out that management for grizzly bears is not discussed in the analysis report. They question whether a conservation strategy exists in the Fraser Timber Supply Area and, if not, how grizzlies will be adequately conserved and maintained as required by the Forest Practices Code.

The Burke Mountain Naturalists express surprise that only 34 hectares were set aside under recreation values, given the beauty of areas like Weaver and Chehalis Lakes, and the Upper Pitt Valley. They say the latter is an increasingly popular recreation destination, and a management plan is required that reflects the scarcity of mature timber and the high recreation values.

Visually Sensitive Areas

The West Coast Environmental Law Association and the Burke Mountain Naturalists are of the opinion that reducing visual standards to maintain harvest levels will impair opportunities for other economic activity, notably tourism. The association believes public consultation on this reduction was inadequate because of the lack of a Land and Resource Management Plan process. They note visual quality objectives are needed for more than 20 per cent of the timber supply area, and the Pitt and Nahatlatch landscape units should be included. The association notes that the Chilliwack Forest District has said it manages for visual values outside the designated visually sensitive areas; if so, the association says the assumptions used in the analysis are incorrect and operational difficulties will result. Further sensitivity analysis and public consultation are needed, according to the association.

J.S. Jones Holdings recommends further revision of visual quality objectives, following a new survey of public opinion. They say an assessment is needed of whether the public's wishes can be achieved while still removing more timber per hectare. Interfor recommends designating Scenic Areas in the primary areas such as highway corridors and important tourist destinations, while relaxing visual quality requirements in the remaining areas (specifically Nahatlatch Valley and the upper half of Harrison Lake).

The Coast Forest and Lumber Association says the chief forester recently directed Forest Service staff to manage visual resources to increase timber supply, achieving a five per cent volume increase annually. The association recommends the analysis be remodelled to achieve a five per cent timber supply gain at an operational level. The Ministry of Environment questions how reducing the classification of the most visually sensitive areas from 16 to four per cent assists in meeting the goal of reducing visual constraints by four per cent. The ministry also questions how this reduction will affect spotted owl management, which uses these constrained forests to meet owl habitat objectives.

Fraser Timber Supply Area

Watersheds

The BC Tap Water Alliance says community watersheds have already been heavily logged and should be exempted from future harvesting. The Alliance points to the large, dispersed population that relies on surface-fed water sources and to the growing knowledge of long-term impacts of forest management on runoff and stream environments, especially with the heavy rainfall in this timber supply area.

The West Coast Environmental Law Association also says watershed logging is a significant issue in the Fraser Timber Supply Area where people have lost homes and property due to spring flooding. The association says professionals consider extensive clearcutting to be a cause of or contributing factor to this flooding and that watersheds must be assessed to identify those with too high a risk for further logging. Reduced harvesting levels that would result from this process are not reflected in the timber supply analysis, according to the association.

The Western Canada Wilderness Committee says historic clearcutting has destabilized many river systems in the Fraser Timber Supply Area, causing damage to property and to fish habitat Watershed assessments are need to identify watersheds where logging should be limited to maintain a stable drainage system.

Socio-Economic Impacts

The Fraser Valley Regional District and the District of Hope both express the opinion that the operation of the Boston Bar sawmill, or other local tenure holders, must not be jeopardized by harvest reductions. They point to high community dependence, and question the analysis' statement that only 15 per cent of basic employment is in forest-related activities. The regional district says harvest reductions should be mitigated by stand conversion and increased community forest and woodlot tenures, which have been shown to increase the yield from a harvest area.

J.S. Jones says their license in the Fraser Timber Supply Area supplies fibre for one shift at the Boston Bar sawmill and additional wood is purchased from other areas. They say local and provincial harvest reductions will seriously impact the economic viability of the mill by making wood more difficult or expensive to secure. Their submission says the socio-economic impacts identified in the analysis report do not present a true and accurate picture, especially of impacts on smaller communities with less diversified economies (like Boston Bar and Hope).

According to the submission from the Coast Forest and Lumber Association, the socio-economic analysis understates the impacts of a reduced harvest on employment, incomes and government revenues. They point out the Fraser Timber Supply Area cannot be treated in isolation because logs cross many boundaries in coastal BC. The association maintains the social and economic trade-offs of different approaches to management are not analyzed in the timber supply analysis. For example, starting with a target of maintaining the number of forest-related jobs would force adjustments to the current conservative approach used in the analysis, and allow consideration of trade-offs. Further, the association says the socio-economic analysis does not identify other significant uses of the forest land base that are currently being suppressed and that could be expected to increase in response to a reduced rate of harvest.

The Western Canada Wilderness Committee is of the opinion that the analysis keeps the rate of logging far above the sustainable level, putting future logging jobs and community stability at risk. The Northwest Ecosystem Alliance, pointing to the continuing economic growth of Washington and Oregon, says a growing body of empirical evidence supports the conclusion that the health and desirability of the region is because of, and not in spite of, the shift in management priorities away from

resource extraction and toward conservation and quality of life.

First Nations
The Nlaka'pamux Nation Tribal Council says their traditional territory covers more than 35 per cent of the Fraser Timber Supply Area. They maintain the impacts of forest practices on their traditional values, uses, rights and title are not properly identified or considered in the analysis. They say forest stand attributes critical to Nlaka'pamux Nation values are not maintained, protected and/or enhanced. The Council also clarifies they are not participating in the current treaty process, contrary to the statement made in the *Public Discussion Paper*.

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Harvest Levels
The Ministry of Environment provides a reminder that in the Rationale Statement for the previous allowable annual cut determination for the Fraser Timber Supply Area, the chief forester stated that even a 10 per cent overestimate of volume would require a 450,000 cubic metre per year reduction in initial harvest rate. The ministry asks for clarification why, when the overestimate was 23 per cent, the expected decline in harvest is not occurring.

J.S. Jones Holdings says companies with processing plants should be given special consideration in allocating timber because of their role in maintaining local employment and supporting the local economy. They suggest no reduction in the allowable annual cut or differential reductions in different areas to protect the economies of small communities. Jones says their mill should be recognized for utilizing more fibre per hectare than other licensees and their harvest should increase accordingly.

The Fraser Valley Regional District and the District of Hope express support for the harvest levels proposed in the *Timber Supply Analysis Report*. Hope notes outstanding land claims will result in further harvest reductions.

The Western Canada Wilderness Committee says the allowable annual cut should be set at no more than 500,000 cubic metres per year in order to ensure long-term stability and to protect watersheds, fish, wildlife and other values. The Coast Forest and Lumber Association recommends maintaining the allowable annual cut at or near the current level for the next five years.

Interfor says the current harvest rate should be reduced in the range of five to 10 per cent, to account for short-term uncertainties and allow time for more accurate long-term growth rate information to become available. Interfor believes the long-term harvest rate should be achieved earlier than indicated in the Timber Supply Review, due to faster growth rates.

The West Coast Environmental Law Association says the proposed allowable annual cut is 30 per cent above the sustainable level and questions the rush to harvest so much wood in current poor market conditions. They say this will perpetuate the age class imbalance in managed forests. The association also suggests a sensitivity analysis of the impacts of determining harvest levels by individual landscape unit.

Cattermole Timber says substantial reductions to the allowable annual cut are predetermined by past land use decisions, inventory audits and other forest management practices. The company says a concerted effort and strategy are needed to practice management that increases the productivity of forest land.

The Burke Mountain Naturalists say the base case forecast appears to be far too high, and that short-term gain will not outweigh long-

term damage that will compromise future jobs in forestry and tourism, the viability of salmon streams and wildlife habitat, and the natural beauty of the valley. The naturalists say the allowable annual cut should be determined within each landscape unit, and also note their disappointment that clearcutting remains the predominant harvesting method. They say they hoped the Forest Practices Code would bring more modern, eco-sensitive techniques.

The Northwest Ecosystem Alliance says the proposed harvest levels are unsustainable and unrealistic. They ask the Ministry of Forests to revisit the process and assumptions (e.g. inclusion of deciduous and marginal forests, shorter rotations, disregard for the *Biodiversity Guidebook*) and base its allowable annual cut on the well-being of its citizens, sound science, and species preservation and international cooperation.

Timber Supply Review Process

The Burke Mountain Naturalists and the BC Tap Water Alliance express concern that only one Open House was held in the Chilliwack area. They say since most stakeholders live in Greater Vancouver, a second Open House should have been held there. They also comment that advertising for the Open House only appeared two days in advance of the event. The groups also express disappointment the review period occurred during the summer months when many people are away.

The Nlaka'pamux Tribal Council says the government has not consulted with them with respect to resource use planning and the Timber Supply Review fails to incorporate their concerns.

The Ministry of Environment expresses concern that a Timber Supply Review team was not developed so they would be involved from the beginning and be able to support the information package and the analysis.They also suggest each biogeoclimatic subzone should be designated as an analysis unit. This would allow modelling of old growth retention target percentages within a landscape unit and within subzone variants.

The West Coast Environmental Law Association suggests a sensitivity analysis that would test the cumulative effect of more realistic or conservative management assumptions. The association is still awaiting further information from Ministry of Forests staff and asks for the opportunity to comment further once this has been provided.

Appendix 1

Submissions received by the Chilliwack Forest District

Submissions received on the Data Package

First Nations
Katzie First Nation
Squamish Nation

Local government
District of Kent

Government agencies
Ministry of Environment, Lands and Parks; Fish, Wildlife and Habitat Management

Industry
Interfor (International Forest Products Ltd., Lower Mainland Operation)

General public
One individual submission

Submissions received on the Timber Supply Analysis Report

First Nations
Nlaka'pamux Nation Tribal Council

Local government
Fraser Valley Regional District
District of Hope

Government agencies
Ministry of Environment, Lands and Parks; Fish, Wildlife and Habitat Management

Industry
Cattermole Timber
Interfor (International Forest Products Ltd., Lower Mainland Operation)
J.S. Jones Holdings Ltd., Boston Bar Division
Coast Forest and Lumber Association

Interest groups
Western Canada Wilderness Committee
West Coast Environmental Law Association
BC Tap Water Alliance
Burke Mountain Naturalists
Northwest Ecosystem Alliance